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*Lead Counsel for the Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: CATHODE RAY TUBE (CRT)** ) Master File No. CV-07-5944 SC  
**ANTITRUST LITIGATION** )  
 ) MDL No. 1917  
 )  
 ) **SECOND DECLARATION OF LAUREN**  
 ) **C. CAPURRO IN OPPOSITION TO**  
 ) **PHILIPS TAIWAN LIMITED'S AND**  
 ) **PHILIPS DO BRASIL LTDA.'S MOTION**  
 ) **TO DISMISS FOR INSUFFICIENT**  
 ) **SERVICE OF PROCESS AND LACK OF**  
 ) **PERSONAL JURISDICTION**

**This document relates to:**

**ALL INDIRECT PURCHASER ACTIONS**

**[REDACTED VERSION OF DOCUMENT(S) SOUGHT TO BE SEALED]**

1 I, Lauren C. Capurro, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to  
3 practice before this Court. I am an associate with the law firm Trump, Alioto, Trump & Prescott,  
4 LLP and my firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs ("Plaintiffs") in the  
5 above-captioned action. I make this second declaration in further support of the Indirect  
6 Purchaser Plaintiffs' Opposition to Philips Taiwan Limited's ("Philips Taiwan") and Philips do  
7 Brasil Ltda.'s Motion to Dismiss for Insufficient Service of Process and Lack of Personal  
8 Jurisdiction. Except where otherwise stated, the matters set forth herein are within my personal  
9 knowledge and if called upon and sworn as a witness I could competently testify regarding them.

10 2. I am informed and believe that Plaintiffs' counsel did not state during the March  
11 4, 2014 conference that "they could not rule out the possibility that they would seek substantial  
12 jurisdictional or merits discovery related to" Philips Taiwan and Philips Brazil.

13 3. I am informed by Plaintiffs' counsel who participated in the March 4, 2014 call  
14 that their notes of the call do not reflect any discussion of merits discovery, and Plaintiffs'  
15 counsel have no independent recollection of such a discussion. Rather, Plaintiffs' counsel's notes  
16 indicate that the parties discussed jurisdictional discovery only. In addition, they never stated  
17 that the jurisdictional discovery would be "substantial."

18 4. If jurisdictional discovery regarding Philips Taiwan and Philips Brazil becomes  
19 necessary, it would be very limited and targeted.

20 5. The discovery cut-off is still four months away. Discovery is still in full swing.  
21 The many parties to this MDL are propounding and responding to discovery requests and  
22 deposing witnesses on an almost daily basis. Plaintiffs are scheduled to depose several former  
23 employees of Philips CRT business over the next few months.

24 [REDACTED] Attached hereto as Exhibit A is a true and correct copy of HEDUS-CRT-  
25 00189334-46, which was produced by defendant Hitachi Electronic Devices USA, Inc. This  
26 document is [REDACTED]

27 [REDACTED]

28 [REDACTED]

\_\_\_\_\_

\_\_\_\_\_

<http://www.industrydocuments.ucsf.edu/docs/whd00001>

\_\_\_\_\_

///

“ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

██████████ Attached hereto as Exhibit F is a copy of LPD\_00013423, which is

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 19th day of May 2014, at San Francisco, California.

/s/Lauren C. Capurro

Lauren C. Capurro

# EXHIBIT A

**CONDITIONALLY FILED UNDER SEAL**

# EXHIBIT B

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION )  
 ) No. 07-cv-05944 SC  
This Document Relates to: ) MDL No. 1917  
...(continuing caption page 2) )

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
CITY AND COUNTY OF SAN FRANCISCO

STATE OF CALIFORNIA, et al., )  
 )  
Plaintiffs, )  
 ) No. CGC-11-515784  
v. )  
 )  
SAMSUNG SDI, INC., CO., LTD, )  
et al., )  
Defendants. )

HIGHLY CONFIDENTIAL  
DEPOSITION OF PHILIPS ELECTRONICS  
NORTH AMERICA CORPORATION, INC.  
AND KONINKLIJKE PHILIPS ELECTRONICS N.V.

By and through their Corporate Designee,  
ROGER DE MOOR  
Washington DC  
Tuesday, July 31, 2012  
9:13 a.m.



1 UNITED STATES DISTRICT COURT  
 2 NORTHERN DISTRICT OF CALIFORNIA  
 3 SAN FRANCISCO DIVISION

4 IN RE: CATHODE RAY TUBE (CRT)  
 5 ANTITRUST LITIGATION

6 This Document Relates to: ) No. 07-cv-05944 SC  
 7 Direct Purchaser Plaintiff ) MDL No. 1917  
 8 Class Actions; )

9 Indirect Purchaser Plaintiff )  
 10 Class Actions; )

11 State of Florida, Office of )  
 12 the Attorney General, )  
 13 Department of Legal Affairs )  
 14 v. LG Electronics, Inc., et )  
 15 al., No. 2011-CV-6205 SC )

16 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 17 CITY AND COUNTY OF SAN FRANCISCO

18 STATE OF CALIFORNIA, et al., )

19 Plaintiffs, )

20 v. )

21 No. CGC-11-515784 )

22 SAMSUNG SDI, INC., CO., LTD, )  
 et al., )

Defendants. )

Highly confidential deposition of ROGER DE MOOR,  
 taken on behalf of Indirect Purchaser Plaintiffs, at  
 Baker Botts, LLP, 1299 Pennsylvania Avenue, NW,  
 Washington, DC 20004. beginning at 9:13 a.m. and  
 ending at 5:14 p.m., on Tuesday, July 31, 2012,  
 before LEE BURSTEN, CRR.

**CONDITIONALLY FILED UNDER SEAL**

# EXHIBIT C

**CONDITIONALLY FILED UNDER SEAL**

# EXHIBIT D

**CONDITIONALLY FILED UNDER SEAL**

# EXHIBIT E

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE )  
(CRT) ANTITRUST )  
LITIGATION, )  
 )  
 ) No.  
This Document Relates to: ) 3:07-cv-05944-SC  
 )  
ALL ACTIONS ) MDL No. 1917  
 )

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VIDEOTAPED DEPOSITION OF KENICHI HAZUKU  
CHICAGO, ILLINOIS  
WEDNESDAY, JUNE 12, 2013

REPORTED BY:  
SANDRA L. ROCCA, CSR, CRR

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE )  
(CRT) ANTITRUST )  
LITIGATION, )  
 )  
 ) No.  
This Document Relates to: ) 3:07-cv-05944-SC  
 )  
ALL ACTIONS ) MDL No. 1917  
 )

The videotaped deposition of KENICHI  
HAZUKU, called by the Plaintiffs for examination,  
pursuant to Notice, and pursuant to the Rules of  
Civil Procedure for the United States District  
Courts, taken before Sandra L. Rocca, CSR, CRR, at  
131 South Dearborn Street, Chicago, Illinois, on  
the 12th day of June, 2013, at the hour of  
9:21 a.m.

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# EXHIBIT F

**CONDITIONALLY FILED UNDER SEAL**